

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Newport News Division)

BUILDERS MUTUAL INSURANCE COMPANY,)
)
Plaintiff,)
v.) Case No. 4:10cv00068-MSD-FBS
)
PARALLEL DESIGN & DEVELOPMENT LLC, and) formerly:
RICKY L. EDMONDS,) Case No. 3:09CV00800
) (Richmond Division)
Defendants.)

PLAINTIFF BUILDERS MUTUAL INSURANCE
COMPANY'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, Builders Mutual Insurance Company, the Plaintiff herein, moves for summary judgment on its Complaint for Declaratory Judgment against Defendants Parallel Design & Development LLC, and Ricky L. Edmonds, for the reasons set forth in Plaintiff's Memorandum of Support filed herewith.

Date: October 19, 2010

Respectfully submitted,

BUILDERS MUTUAL INSURANCE COMPANY
By Counsel

SANDS ANDERSON PC

/s/

Danny M. Howell VSB No. 30352
Michael T. Marr VSB No. 48536
Mikhael D. Charnoff VSB No. 43929
Courtney S. Schorr VSB No. 65971
SANDS ANDERSON PC
1497 Chain Bridge Road, Suite 202
McLean, VA 22101
Telephone: (703) 893-3600
Facsimile: (703) 893-8484
Counsel for Builders Mutual Insurance Company

and

Jeffrey H. Geiger VSB No. 40163
SANDS ANDERSON PC
1111 East Main Street, 24th Floor
P. O. Box 1998
Richmond, Virginia 23218-1998)
Telephone: (804) 783-7248
Facsimile: (804) 783-7291
E-mail: jgeiger@sandsanderson.com
Counsel for Builders Mutual Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Richard G. Collins, Esquire
Gilbert A. Bartlett, Esquire
Gilberg A. Bartlett PC
809 Richmond Rd
Williamsburg, VA 23185
(757) 229-1910
Fax: (757) 229-7323
Email: rcollins@gilbertabartlett.com
Counsel for Parallel Design & Development LLC

and

Richard James Serpe, Esquire
Law Offices of Richard J. Serpe, P. C.
580 E Main St
Suite 310
Norfolk, VA 23510
(757) 233-0009
Fax: (757) 233-0455
Email: rserpe@serpefirm.com

Jeffrey Arnold Breit
John Webb Drescher
Michael F. Imprevento
Breit Drescher & Imprevento PC
1000 Dominion Tower
999 Waterside Dr.

Norfolk, VA 23510-3320
(757)670-3884
Fax: (757) 299-8035
Email: jbreit@bdbmail.com
jdrescher@breitdrescher.com
mimprevento@ breitdrescher.com

Frederick Steven Longer
Levin Fishbein Sedran & Berman
510 Walnut Street
Suite 500
Philadelphia, PA 19106
(215) 592-1500
Fax: (215)592-4663
Email: flonger@lfsblaw.com

Counsel for Ricky L. Edmonds

/s/

Danny M. Howell VSB No. 30352
dhowell@sandsanderson.com
Sands Anderson PC
1497 Chain Bridge Road, Suite 202
McLean, VA 22101
703-893-3600 Phone
703-893-8484 Fax